

What do UCSC biologists and other experts have to say about the LRDP and its EIR (Environmental Impact Report)?

The new Long-Range Development Plan praises itself for maintaining a “commitment to careful stewardship of the remarkable site entrusted to the campus”. This sounds nice on paper, but if you step back and do some simple calculations, the development being proposed is a reflection of anything but careful stewardship.

As required under California law, an Environmental Impact Report is a detailed evaluation of the potential environmental impacts of a development project, and must include mitigation measures to offset negative impacts.

The EIR for the 2005 LRDP has been widely criticized by analysts and experts of all stripes as both inadequate and inaccurate. This highly inaccessible 900+ page document attempts the cumbersome task of making a 4,500 increase in student population on this campus appear reasonable, ecologically sound, and feasible. It does a poor job.

Karen Holl

Restoration Ecologist and Professor of Environmental Studies, employed at UCSC since 1995. Karen Holl served on the LRDP Planning Committee.

“The University proposes to do extensive development in upper campus and simply note that there will be substantial and unavoidable impacts, which is in complete contradiction with the stated principles of the LRDP to promote sustainability and environmental stewardship. I am unclear what the point of stating planning principles is, if these principles are adhered to so loosely as to be meaningless.”

“I consider much of the development that is proposed to be incompatible with the teaching and research mandate of the Campus Natural Reserve lands. Specifically, I am concerned about the extensive campus development proposed around the seep zone area, and have repeatedly voiced this concern during the LRDP process. With the extensive proposed development, the drainage patterns into the seep zone will be altered which will affect the ecosystems.”

“I realize and appreciate the fact that the University proposes to make many efforts to mitigate impacts of growth. But, the University has to acknowledge that growth on the UCSC campus cannot continue indefinitely and that to meet the stated needs of increased enrollments the University of California systemwide will need to look elsewhere. Personally, I think the time to do that is now, as the UCSC campus is growing well beyond resource constraints.”

source: 2005 LRDP EIR - Comment Letter I-37

Tonya Haff

Biologist and Ornithologist, Curator of UCSC Museum of Natural History Collections, and Environmental Studies faculty.

“I found the draft fraught with error, from misapplied species names to misidentified animals and weak habitat associations. I believe that this undermines the basic integrity of the report...

...Many of these mistakes can only have been made from cookbook-like, cut-and-paste report writing, or from the use of exceedingly poorly trained biologists. Unfortunately, I believe that these mistakes make all management/mitigation suggestions suspect, as the conclusions decision-makers come to can only be as sound as the science these conclusions are based upon.”

“Perhaps of most concern in the Biological Impacts section is the extremely vague wording used when describing potential mitigation measures for sensitive species and habitats. I believe that the language is so vague in these sections as to often be beyond practical application. For example, language used in conjunction with mitigation measures include phrases such as “to the extent possible”, “financially viable”, and “avoidance measures”. While I appreciate the fact that the future is speculative by nature, vague wording also allows room for interpretation by developers and other non-biologists whose main intent is not the welfare or maintenance of sensitive species, but rather to see construction projects carried out in a timely and economical manner. Almost all of the mitigation measures proposed in section 4.4.2.4 need to be refined in the final EIR so that they offer SPECIFIC, DETAILED plans for how mitigation will be carried out.”

source: 2005 LRDP EIR - Comment Letter I-29

Maggie Fusari

Director of the UCSC Natural Reserves, Lecturer in Environmental Studies and Biology, employed at UCSC since 1980. Served on the LRDP Planning Committee.

“I am concerned with impacts to biological and hydrological resources from the expansion of campus facilities into the north campus. Although several issues have been identified, I do not believe the mitigations for losses and damages are adequate.”

source: 2005 LRDP EIR - Comment Letter OPA-4

“The biggest problem with the Environmental Impact Report (EIR) is that it does only the minimum UCSC considers to be required at this time. Neither it nor the LRDP go into any detail about how the natural systems remaining after the development footprints are laid down will be protected. What the authors did with the EIR was follow the law, but to protect the natural reserve and the region’s natural systems, more than the minimum required by law needs to be done.”

continued on back side >

“My point of view is that I would rather look at an ugly brick wall in front of my house and know that there was open habitat for wildlife somewhere else because I was looking at that wall.”

source: Interview with Maggie Fusari, by Lucas Barth (2006)

California Department of Forestry

San Mateo-Santa Cruz Unit of the CA Dpt. of Forestry and Fire Protection (CDF)

“As correctly identified and described in your DEIR (4.4-68), approximately 120 acres of land classified as timberland is proposed for conversion to non-timber uses. This resource is described in the DEIR as a mixture of second growth redwood, Douglas fir, mixed evergreens, dwarf redwood and hardwoods. After our review we are concerned that your analysis of the removal of this resource was deficient in the project description, regional setting and alternatives analysis. While this resource is arguably not unique or threatened, it is significant both locally and regionally with respect to social, environmental, economic and aesthetic values.”

“In light of the public controversy generated by previous development projects on the campus where considerably smaller amounts of this resource were removed it is confusing why the DEIR placed so little value or discussion on this resource.”

source: 2005 LRDP EIR - Comment Letter SA-7

California Regional Water Quality Control Board

A division of the California Environmental Protection Agency

“Water Board staff is concerned that existing and foreseeable future erosion and sedimentation issues are not being addressed at the source of the problem as development continues through the proposed expansion of the UCSC campus. UCSC has experienced extensive erosion and excessive sedimentation to its natural drainage system that is largely due to increased runoff from impervious surfaces. (concrete, asphalt, buildings - ed) Future development will add more impervious surface to the UCSC campus, thus exacerbating the erosion and sediment problems. Water Board staff has concerns with regards to erosion, sedimentation, urban pollutants, and the lack of source stormwater controls.”

source: 2005 LRDP EIR - Comment Letter SA-3

“Water Board staff is concerned with UCSC’s history of failure to comply with mitigation requirements due to “lack of funding.” UCSC’s 2004 Mitigation Monitoring Program Report repeatedly states that mitigation measures were not implemented due to “lack of funding” and “budget constraints.” Such terms are unacceptable. Water Board staff would like to reiterate that **mitigation funding is not to be budget dependent.** Funding for development mitigation design must be a priority and should receive adequate funding before project design begins.”

source: 2005 LRDP EIR - Comment Letter SA-4

Grey Hayes

PhD biologist, former UCSC Natural Reserve Steward

“It is my firm belief from many years of careful examination of UCSC that the current level of development has exceeded the campus’ institutional, physical, and biological capacity. The signs are everywhere: unfunded mitigations, eroding hills, and disappearing species. It is unwise to further develop campus until such a time that we can manage our current obligations. To continue expanding development is to burden future generations with the damage we wrought now.

It is unethical that those in power choose to move forward with these plans: if all others were welcomed to act in such a way, our infrastructure, water resources, and natural lands would be in serious peril. The Administrators (and those that enable them) risk the people’s trust with this and so much other recent gambling.

We lead by example.”

source: 2005 LRDP EIR - Comment Letter I-34

The Final Environmental Impact Report, after minor revisions from the draft copy, was presented to the UC Regents on September 19th, 2006. This action was in spite of a motion adopted by the Academic Senate in April of 2006 asking the administration to delay submitting the LRDP and EIR from September to November, in order to deal with faulty environmental impact analysis.

The Regents granted approval, but since that time, a Superior Court Judge has ruled that the EIR is invalid in the areas of housing, traffic, and water and must be revised. The Judge dismissed claims against 13 other aspects of the EIR, though the issues raised in these claims remain significant, and could very well resurface in future lawsuits. The EIR is now entangled in an ongoing legal standoff and an intense public controversy - and no one is sure what exactly will happen next.

Information current as of February 2008.



A legacy of stewardship?